



Governor Judy Martz

Montana

Department of Labor and Industry

Workforce Services Division

March 10, 2005

Ms. Christine Kulick
USDOL/ETA
Office of Workforce Investment
Division of One-Stop Operations
Room S-4231
200 Constitution Avenue, NW
Washington, DC 20210

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RECEIVED

Dear Ms. Kulick:

Enclosed is Montana's waiver request to extend the implementation of the subsequent eligibility process for Eligible Training Providers as described in the Workforce Investment Act, Section 122 (c)(5) and WIA Regulations 663.530 until June 30, 2007.

This postponement will allow Montana to better determine the most effective and efficient method of collecting the training providers' performance data as well as alleviate our providers' concerns with the types and amount of information being requested. Montana fully supports the concepts of consumer choice and program accountability as directed in the Workforce Investment Act and believes that this postponement will allow our providers and us to meet those goals. Implementation of the subsequent eligibility determination process would continue throughout this time period with a final implementation date of June 30, 2007.

If you have any questions regarding this request, please feel free to contact Kate Kahle, MIS Program Specialist at (406) 444-9043.

Thank you for your consideration of our waiver request.

Sincerely,

A handwritten signature in cursive script that reads "Ingrid Childress".

Ingrid Childress, Administrator
Workforce Services Division



State of Montana
Waiver Request
Workforce Investment Act
Subsequent Eligibility Determination of Eligible Training Providers

The Montana Department of Labor and Industry (MDLI), the State administrative entity for the Workforce Investment Act (WIA), is requesting an extension of the original waiver submitted to DOL-ETA on March 4, 2002 to postpone the implementation of the Subsequent Eligibility Determination process for Eligible Training Providers (ETP). We request an extension until June 30, 2007.

We request this waiver extension so that Montana can better determine the most effective and efficient method of collecting the training providers' performance data as well as alleviate our providers' concerns with the types and amounts of information being requested. Many of Montana's training providers have expressed their concerns with the cost and time involved in developing a reporting system which will gather information relating to wages and/or placement of those individuals participating in their programs. Data for those participants who received assistance under WIA is available at this time; however, data for all individuals participating in educational programs is not easily captured.

The following steps are either under way at this time, or will be in the near future:

- MDLI has contacted the Office of the Commissioner of Higher Education (OCHE) regarding data collection for performance data. OCHE can provide all required performance data except wage and placement data for a large number of state-based educational institutions. MDLI is exploring options to collect wage and placement data at this time.
- MDLI and Montana's two Local Workforce Investment Boards (LWIBs) will set up meetings with registrars at the large educational institutions not included in OCHE's database. Staff will explore options to collect performance data with the registrars of these institutions.
- MDLI is developing a new Management Information System (MIS) to capture data for workforce programs. This proposed waiver will allow MDLI the opportunity to complete the design of our ETP website, which will be available when the new MIS is online. The website will be available to all participants, training providers, and service providers and will allow them to view training information and eligibility status, and complete on-line applications.
- LWIBs will send a letter to existing programs on Montana's ETP to update program information. This will ensure that OCHE database searches will provide the most up-to-date data available.
- MDLI and LWIBs will set up an advisory group to determine how to collect performance data from other providers currently on Montana's ETP.

The goals and outcomes of the March 4, 2002 waiver remain the same.

This waiver is being requested in the format described in WIA Section 189 (i) (4) (B) and WIA Regulations 661.420.